

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\*\*\*\*\* DOCKET NO. 04-1815 GAO

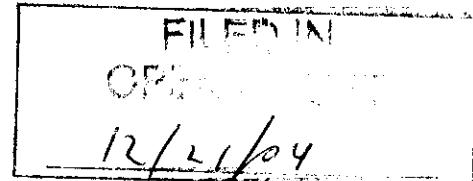
AT&T CORP.,

Plaintiff

VS.

GENERAL INSULATION COMPANY,

Defendant(s)



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**JOINT SCHEDULING STATEMENT**

Pursuant to Rule 16.1 of the local rules of this Court, the parties to this action, by and through their undersigned counsel, hereby submit the following joint statements regarding a proposed pre-trial schedule and other matters.

**DISCOVERY PLAN**

The Parties jointly propose the following discovery schedule:

- (1) All amendments to the pleadings to be filed on or before February 21, 2005.
- (2) All written discovery and depositions of fact witnesses to be completed on or before August 21, 2005.

- (3) Plaintiff's designation of experts and complete answers to expert interrogatories on or before October 21, 2005.
- (4) Defendant's designation of experts and complete answers to expert interrogatories on or before November 21, 2005.
- (5) Completion of allowed expert depositions on or before January 1, 2006.
- (6) Completion of all deposition testimony intended to be used in lieu of live testimony at time of trial on or before January 1, 2006.
- (7) Final pre-trial conference some time after January 1, 2006.

The Plaintiff's and the Defendant's Attorneys affirmatively state that they have discussed the probable budget for costs of conducting the full course- and various alternative courses- of the litigation, and, the resolution of the litigation through the use of alternative dispute resolution programs outlined in local rule 16.4.

#### **SCHEDULE FOR FILING MOTIONS**

A. All deposition motions, together with supporting documents, shall be filed no later than forty-five (45) days after the completion of discovery. All responses, with supporting documents, shall be filed within thirty (30) days of the filing of any such motion.

B. All other motions (including, but not limited to, motions to amend the pleadings), but not including motions in limine and motions which arise in connection with experts identified by any

party, shall be filed no later than forty-five (45) days after the completion of discovery.

Responses shall be due in accordance with the applicable rules, except as otherwise agreed or as may be ordered by the Court.

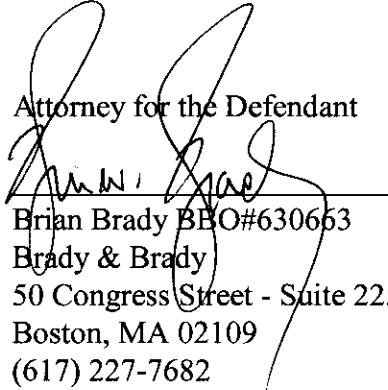
### **CERTIFICATE OF COUNSEL AND PARTIES**

Certificates of counsel and parties indicating compliance with Local Rule 16.1(D)(3) are attached hereto.

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